479543

Comments on 6 June 2000 Draft Work Plan Submitted by W.R. Grace & Co. Removal and/or Abatement of Asbestos and Vermiculite at the Libby Asbestos Site

DESCRIPTION	Section Number	Page	Comment
Site Location & Description of Property	1.1	1-3	1. The 13,800 residences are within a 4-5 mile radius of Libby.
Facility History	1.2	1-6	1. In the 2nd and 4th paragraphs, remove statements about dust control measures implemented at the mine. These comments are unrelated to the removal actions and do not add to the objectives of the work plan.
Recent Regulatory Developments	1.3	1-7	1. This section states that "In a few hot spots the levels of asbestos in the soil samples exceeded two percent". The word "few" is too subjective and should be removed. Instead present the actual data.
Work Plan Organization	1.4	1-8	1. The six bullets list the plans to be provided after mobilization. Approval of the plans are required prior to commencement of activities at the site. Submitting these plans after mobilization does not allow time for adequate and appropriate review prior to your procurement and implementation. 2. The Scope of Work (SOW) required additional plans to be submitted with the work plan that were not mentioned or otherwise addressed in the Work Plan. These are as follows: • Test Pit Excavation Plan (or an alternative proposal to address the deeper pockets of vermiculite) •Building Decontamination Feasibility Plan •Equipment and Personnel Decontamination Plan •Site Control Plan
Scope of Work	2.0	2-1	1. Third bullet (as well as much of the work plan) is based on the assumption that USEPA approves the decontamination procedure based on the Building Decontamination Feasibility Plan. Because this Plan was not submitted, EPA can not agree with the proposal to decontaminate buildings in place.

Task 1 - Project Planning *Traffic Control Plan*	2.1.1	2-3	1. When submitted, the Traffic Control Plan shall address types of signs, locations and distance between signs. DOT, State and County requirements shall be followed at a minimum. Possible signs required include, but are not limited to, Flagman Ahead and Heavy Trucks Entering Ahead. 2. Provide plan view of vehicle route for traffic control. 3. Show decon pads on plan view of vehicle route. 4. Show flagman locations on vehicle route.
Task 1 - Project Planning; *Dust Control Plan*	2.1.1	2-3	1. No Dust Control Plan was submitted as required by the SOW. 2. The hydrant is located within the zone of soil excavation. Address requirements for use of hydrant for dust control with regard to accessability. 3. Is a meter to be used to track water usage for payment purposes? 4. Meteorological Station shall be present and used on site for duration of field activities.
Task 1 - Project Planning; *Erosion Control Plan*	2.1.1	2-4	1. No Erosion Control Plan was submitted as required by the SOW. 2. Identify contractor to perform survey. 3. Identify location of bench marks. 4. Identify what contour interval is to be used. 5. Use scale bar on all plan views. 6. Identify any State and Local Agencies that should review erosion plan. 7.Runoff onto designated clean areas is also a major issue that must be addressed.

Task 1 - Project Planning; *Building Decontamination Plan*	2.1.1	2-4	1. No Building Decontamination Plan was submitted as required by the SOW. 2. Discuss water filter media, discharge location and discharge regulatory requirements. 3. State whether the cleaning rooms are within each building or are centralized. 4. Provide plan view schematics of decon layout for structures and for materials within structures to be deconed. 5.Identify how materials, following decontamination and transfer through a clean room, are transported to Sprung Building particularly if this task is completed prior to soil removal? How will cross contamination issues be handled? 6.Identify when inventory of materials in located in structures will be conducted? Will all building contents within all buildings be inventoried at the same time? 7. Is insurance being carried on materials while under control of W.R. Grace? 8. Due to the type of construction and the nature of the construction materials, discuss how HEPA vacuum will be successful in decontamination of buildings. Discuss whether siding and roofing will be removed to successfully remove asbestos. Discuss how cleaning will be done on the wooden floors which are both porous and irregular. 9. Are all materials removed for disposal being double wrapped during transport or handled in some other manner? Discuss. 10. What mil thickness is being used to wrap materials for disposal?
Task 2 - Project Management	2.1.2	2-5	1. As stated in the SOW daily ambient air monitoring results are to be sent to State and USEPA within 24 hours of collection. These must be submitted in addition to the weekly reporting.

Task 4 - Site Preparation	2.1.4	2-6 & 2-7	1. The temporary lumber storage must be accessible by the tenant. The tenant and the City object to relocation of the retail business within the Export Plant property due to legitimate concerns about traffic and health & safety. Another location must be found which is suitable to all parties. 2. Are sumps installed in all storage areas? Discuss. 3. SOW requires 20 mil liner for equipment decon. An adequate amount of gravel or stone must be placed to ensure protection of this liner. 4. Address over spray concern at equipment decon. 5. Building decontamination on Page 2-4 should address issues in last bullet on page 2-7 regarding drains and plastic sheeting. 6. Task 3 on Page 2-6 does not discuss mobilization of decon trailers. How many trailers are to be mobilized? 7. The traffic control plan on Page 2-3 should discuss the traffic issues and control at the pads.
Task 5 - Site Support Services	2.1.5	2-9	1. Show tentative re-location area of road contractor on plan view. Also discuss how this relocation will be coordinated.
Task 6 - Furnish/Install/Operate and maintain Sprung Building	2.1.6	2-9	1. How will the clean corridor be established and what materials shall be used? Discuss.

Task 7 - Pole Barn (Building 1) Decontamination	2.1.7	2-9	1. Describe how the aggressive air sampling will be performed in the building following decontamination. 2. How will the decontamination between corrugated metal roof and underlying asphalt shingles be conducted? Discuss. 3. How will electrical utilities and wiring be protected from power washing? Discuss. 4. Is over spray an issue and how will it be addressed? 5. Discuss the feasibility of removing asbestos between wood siding and wood framing? 6. Materials cleaned and removed for storage must be returned to the structure. 7. Ingress and egress, in addition to establishing and maintaining clean rooms, need to be addressed since these activities are taking place prior to removal of contaminated soils around the structures.
Task 8 - Old Vermiculite Storage Warehouse Decontamination	2.1.8	2-10	1. What is the decon procedure between the metal roof and the wooden roof? Discuss. 2. Can asbestos be removed between wood siding and wood framing? Describe in detail how this would be performed. 3. How will the aggressive air sampling be performed in the building following decontamination? 4. How will electrical utilities and wiring be protected from power washing? Discuss. 5. Is over-spray an issue and how will it be addressed? 6. Materials cleaned and removed for storage must be returned to the structure. 7. Ingress and egress, in addition to establishing and maintaining clean rooms, need to be addressed since these activities are taking place prior to removal of contaminated soils around the structures.

Task 9 - Large Lumber Warehouse	2.1.9	2-11	1. How will the aggressive air sampling be performed in the building following decontamination? 2. Define full building containment for this structure and how will it be implemented. 3. Can asbestos be removed between wood siding and wood framing? Describe in detail how this would be performed. 4. Are interior and/or exterior walls removed to complete decontamination? Discuss. 5. How will electrical utilities and wiring be protected from power washing? Discuss. 6. Materials cleaned and removed for storage must be returned to the structure. 7. Ingress and egress, in addition to establishing and maintaining clean rooms, need to be addressed since these activities are taking place prior to removal of contaminated soils around the structures.

Task 10 - Operating Planer Shop Decontamination	2.1.10	2-12	1. Is power washing acceptable practice with machinery present? Discuss and recommend other techniques if power washing is not feasible. 2. Discuss how electrical utilities and wiring will be protected from power washing. 3. Can asbestos be removed between wood siding and wood framing or the tin siding and the wood framing? Describe in detail how this would be performed. 4. Is the ingress and egress being provided for operation of the planer conducive with the soil removal operation? 5. Is the entire structure and the planer room to be decontaminated at the same time? 6. Will the encapsulation of the building impact the planer operations taking place? 7. Is the dust generated by the planer going to impact air monitoring equipment and results? Describe what plans are being addressed to deal with this issue? 8. Materials cleaned and removed for storage must be returned to the structure. 9. Ingress and egress, in addition to establishing and maintaining clean rooms, need to be addressed since these activities are taking place prior to removal of contaminated soils around the structures.

Task 11 - Small Shed Decontamination	2.1.11	2-12	1.How will the aggressive air sampling be performed in the building following decontamination? Describe in detail how this would be performed. 2. Define full building containment for this structure and how will it be implemented. 3. Can asbestos be removed between wood siding and wood framing? Describe in detail how this would be performed. 4. Are interior and/or exterior walls removed to complete decontamination? Discuss. 5. How will electrical utilities and wiring be protected from power washing? Describe in detail how this would be performed. 6. Address soil removal issues and methodology for clean the sump. 7. Materials cleaned and removed for storage must be returned to the structure 8. Ingress and egress, in addition to establishing and maintaining clean rooms, need to be addressed since these activities are taking place prior to removal of contaminated soils around the structures.
Task 12 - Demolished Shed Decontamination	2.1.12	2-13	1. What type of sample shall be taken from the concrete slab and what type of analysis shall be performed? 2. Ingress and egress, in addition to establishment and maintaining clean rooms, need to be addressed since these activities are taking place prior to removal of contaminated soils around the structures.

Task 13 - Transportation To and Disposal at Mine	2.1.13	2-13	1. Describe what type of trucks are to be employed to transport materials. 2. Describe what type of liners and thickness are to be used. 3. Identify where the trucks are to be lined prior to loading as well as where the where the trucks are being tarped after loading. 4. Dozers typically do not provide a very high degree of compaction. A sheepsfoot or other type of compaction equipment is recommended. 5. Is daily cover available? If daily cover is to be used, identify the source. 6. Sampling protocols and sample number shall be provided.
Task 14 - Surface Excavation	2.1.14	2-13	1. Explain the rationale for decontaminating buildings prior to soil excavation. Address issues related to recontamination of cleaned buildings. Clean rooms and clean ingress and egress points need to be maintained during all decontamination of structures and contents of materials inside structures. 2. The excavation zone on Figure 2-1 does not reflect the zone of soil removal in the SOW. Address this issue. 3. Clearly specify dust control equipment to be activated so as not to re-contaminate clean buildings during soil removal and loading operations. 4. OU-1 has suspected areas of asbestos contamination greater than 12 inches. How will the removal method proposed not cross-contaminate cleaned areas when the equipment tracks over that material which is located at greater depths?

Task 15 - Backfill	2.1.15	2-14	1. What is the ASTM classification of the common fill and top soil to be used as backfill? 2. Specify aggregate size and type to be used for the construction of roads and parking areas. 3. If known, identify the source of the materials to be used for backfill and aggregates at the site? 4. Identify how many samples will be collected and specify the test method to verify all imported materials are clean. 5. Address the compaction requirements in the SOW. Provide test methods and number and frequency of tests to be performed. 6. Address the maximum depth of loose lift material to be placed prior to compaction efforts being performed. 7. Provide plan view of all new roads and parking areas to be constructed.
Task 16 - Demobilization	2.1.16	2-14	1. All materials removed from structures and the site for storage must be returned to their respective and original locations. Discuss procedure to ensure all materials inventoried are returned to their respective and original locations.

Air Monitoring Requirements	2.2	2-16	1. Specify TEM analysis for all air sampling and monitoring at the perimeter and of the work zones. For the perimeter and work zone monitoring PCM is a possible alternative to the Data Rams outlined in the SOW. Provide information on their use and timing of data return. Discuss the limitations regarding fiber size and type identification. 2. Provide information with regard to the specific air monitors or sampling devices to be utilized at the site. This includes any pump for perimeter, personnel, egress, clean room and any other location pumps are to be used as in accordance with the SOW. 3. Provide plan view with locations of proposed sites for air monitoring. 4. Provide schematics of proposed layout of decontamination, clean room and egress with proposed air monitoring locations. 5. How many total number of pumps are on site? This should include the number available for back-up due to pump failures, non-calibration and non-charged. Tabulate pump numbers with pump assignment. 6. Address pump rates, hours of operation, recharge requirements, calibration cycles required due to operation. 7. Provide and discuss the laboratory to be used for analysis. This shall include method of transport and turnaround time for sample results. 8. Discuss limits of acceptable readings based on laboratory analytical results and the real time air monitoring.
Background Air Sampling	2.2.1	2-17	1. The SOW specifies TEM analysis yet the Work Plan states that PCM is to be used. TEM is required.
Ambient Daily Air Monitoring	2.2.2	2-17	1. SOW specifies TEM analysis with Data Rams as a potential substitute. See comment 1 under Section 2.2.
Ambient Final Clearance Air Monitoring	2.2.4	2-18	1. Clearly define sampling techniques to be implemented for final clearance of buildings.
Chemical Hazards	2.3.4.1	2-20	1. The contractor, AcandS's, H&S Plan shall be reviewed by EPA and State prior to work.
Air Monitoring	2.3.6	2-21	1. This section states that air monitoring shall be conducted per SMS 43. SMS 43 is listed as utility clearances & Isolation in Paragraph 2.3.4.2 Physical Hazards. Is this correct? Clarify.

Decontamination	2.3.8	2-21	1. Provide all filter media and discharge requirements for any filtered water to be discharged on or off the site.
Emergency Response	2.3.9	2-22	1. Define SMS 49.
Access to Information	2.4.8	2-25	1. Grace may have results for 2 days prior to providing the results to the EPA as long as the EPA receives the sample results within the time frames specified in the SOW. This paragraph should be clarified to indicate that some of the air data is required to be submitted within 24 hours of collection (consistent with Section 2.2.2 of the Work Plan). 2. Note that an exception to Number 1 above shall be the daily ambient air samples that are to be reported to EPA within 24 hours of collection as per SOW. This may not be the only exception with regard to the removal at OU-1. 3. Background air samples to be provided to EPA at time of mobilization. 4. Building Final Closure Sample results are to be provided to EPA within 1 week of completion of decontamination. 5. Post excavation sample results are to be provided to EPA within 1 week of completion of decontamination.
Documentation of Compliance with Other Laws	2.4.10	2-26	1. Include ARAR's and references in this work plan. The Work Plan should specifically delineate how ARARs will be met.

General Comments			1. Provide a table outlining the deliverable for the entire project. These shall include, but not be limited to, weekly reports, sample results and all plans. This outline shall include, but not be limited to: •description of deliverable, •frequency of deliverable, •time allowed for preparation of deliverable' •recipients of documents. 2. Provide a table for sampling results that are to be provided for all activities at OU-1. This table shall include, but not be limited to the sample results of the background air, decontamination activities including clean room and exhaust fan samples, the perimeter air monitoring, soil sampling, final decontamination samples and egress samples. This table shall provide, but not be limited to, the following information: •laboratory, •sampling location, •sample type (soil, water, air), •sample purpose (duplicate, final, split, re-sample) •date sampled •date received, •test method, •detection limit, •reporting limit, •regulatory limit for OU-1, •sample result 3. Additional figures to provide shall include, but not be limited to, the following: • post- closure plan view of OU-1 (include roads and parking), • erosion control placement, • contractor command post layout with location of decon pad, temporary lanes for access and egress for planer shop, shower facilities, vehicle and equipment parking, temporary storage areas, hot zone, and decontamination area, •air monitoring locations •vehicle traffic pattern with sign locations, flagman locations, decon pad location, truck lining location, truck tarp location. 4. The Work Plan and the Health & Safety Plan should address those ARAR's as provided in the Unilateral Administrative Order. Only one ARAR was mentioned in the Work Plan and that was under Section 2.3.6, Air Monitoring.

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June 14, 2000

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Post-it® Fax Note 7671	Date 6-15	# of pages ▶ 1
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RE: Comments on Draft Work Plan for the Export Plant, Libby Asbestos Site, Libby, Montana

Dear Paul:

The Montana Department of Environmental Quality's (DEQ) personnel have reviewed the above-referenced workplan. The workplan, which was submitted by W.R. Grace as required by the Unilateral Administrative Order (UAO), Docket No. CECRLA-8-2000-10, addresses asbestos abatement actions at the former WR Grace Export Facility in Libby, MT. The work plan lacks detail in many areas and I question Grace's comment to adequately address the potential dangers that currently exist at the Export Plant. Therefore, the DEQ considers the plan to be incomplete at this time for numerous technical reasons. Attached please find DEQ's comments on the draft work plan that W.R

Sincerely,

John A. Constan
Project Manger
DEQ – Remediation Division

cc: Mary Capedeville, DEQ
Tom Ellerhoff, DEQ
Denise Martin, DEQ

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General Comments

1. A detailed Health and Safety Plan must be included into the workplan for review. Create a separate section, which contains a detailed description of the decontamination zones for personnel and equipment for review and approval by the EPA and DEQ. Worker and community safety is an essential component of the removal action.

2. Please include a copy of the access agreement WR Grace has from the City of Libby and the Millwork West Company for removal actions at the Former Export Plant.

3. Please include in the workplan a detailed sampling and analysis plan for verification samples of air and soil in and around each building on Site. Please include the number of samples collected, types of samples collected, and the method used for collection and analysis. Include in this section that both the EPA and the DEQ will review the results of each sample collected by WR Grace.

4. Please include a detailed site control and traffic control plan in the revised workplan for review.

5. WR Grace must incorporate a detailed site restoration plan for the entire Export Plant Facility in the revised plan.

6. Anywhere it states that EPA will review, have access approve or be involved in meetings, should be changed to EPA and DEQ.

7. On page 1-3 a table describes each building located on the former Export Plant Facility. Specifically, the small shed is described to have a "concrete slab including a filled 6 ft. x 6 ft. sump." What is the history of this building? What was the sump area used for? What was dumped into the sump prior to it being filled? What is the sump filled with? In addition to answering these questions, DEQ request that WR Grace collects several surface and subsurface soil samples from around the sump area, beneath and if possible, within the sump area. What is the depth of groundwater in the area? All soil samples must be analyzed for volatile organic compounds (EPA Method 524.2), VPH/EPH analysis using the Massachusetts method of petroleum compounds, and complete TCLP analysis for metals.

8. Please provide a section in the workplan where you describe how you comply with ARARs.

9. According to the Asbestos Rules, the contractor can do his own air monitoring relative to OSHA requirements; however, s/he cannot do the final air clearance monitoring following abatement activities. Requirements for clearing asbestos abatement projects are covered in the Asbestos Rules, ARM 17.74.308. Section (2)(a) of that rule states that the person collecting the clearance air samples cannot be employed or contractually associated with the abatement contractor. Clearance air samplers can be an accredited asbestos abatement contractor/supervisor, an engineer, an industrial hygienist, or someone who has completed the NIOSH 582 course.

   Rule sections (1) (h) and (1)(I) cover air sample analytical requirements, i.e. use NIOSH 7400 method for PCM analysis and AHERA 40CFR763 for TEM analysis. Labs doing PCM analysis must be AIHA (American Industrial Hygiene Association) proficient. TEM labs must be accredited by NIST/NVLAP (National Institute of Standards and Technology's National Voluntary Laboratory Accreditation Program). Asbestos Rule 17.74.308 also dictates that five (5) clearance air samples must be collected and analyzed for final air clearance purposes. Rule 17.74.308 (3) (b) dictates that an asbestos abatement project is complete when the air concentration is below 0.01 f/cc as determined by PCM; or less than or equal to 70 structures/square millimeter as determined by TEM. If there is chronic asbestos contamination present and the contractor cannot get the air cleaner than 0.01 f/cc or 70 s/mm2, a waiver pursuant to 40CFR763 (90)(I) can be applied for. Furthermore, these final clearance air samples need to be collected using aggressive methods, i.e. use of 1 hp leaf blower and fans.

10. Water collected from equipment and personnel decontamination facilities must be filtered before discharge using a 5 micron filter size prior to being discharged to a POTW.

11. Since abatement activities will be occurring, persons conducting asbestos abatement activities must be accredited through the Asbestos Control Program. The Asbestos Control Program accredits the following trained and certified personnel: worker, contractor/supervisor, inspector, project designer, and management planner. The contractor must be registered with the Department of Labor and Industry's Construction Contractor Registration Program, (406) 444-7734.

SPECIFIC COMMENTS

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1. Page 1-1, paragraph 1, Section 1.0 Introduction

"The asbestos contamination is suspected to be the result of historical vermiculite mining, storing, processing, and transportation conducted on and around the property." This sentence misrepresents the situation present at both the Export Plant and the Screening Plant. Please change the sentence to the read "The asbestos contamination is a result of historical vermiculite mining, storing, processing, and transportation conducted on and around the property."

2. Page 1-6, paragraph 4, Section 1.2 Facility History

Did WR Grace or the Zonolite Company ever mine amphibole asbestos fibers commercially?

3. Page 1-6, paragraph 5, Section 1.2 Facility History

When did WR Grace sell the former Export Plant to the City and the former Screening Plant to the Parkers?

4. Page 1-7, paragraph 2, Section 1.3 Recent Regulatory Development

The workplan states that "in a few hot spots the level of asbestos in the soil samples exceeded two percent." The use of the word "few" misrepresents the true number of soil samples that have elevated levels of asbestos fibers. Please remove this sentence or change the language to indicate actual number of samples with elevated results.

5. Page 2-1, paragraph 1, Section 2.0 Scope of Work

Currently, WR Grace has not purchased the former mine site property from the Kootenai Development Corporation (KDC). It is assumed that the negotiations between the two parties will be completed shortly and the property will transfer over to WR Grace. However, if WR Grace does not acquire ownership, then the workplan must include an access agreement from the KDC.

6. Page 2-2, paragraph 1, Section 2.1.1 Task 1-Project Planning

Prior to initiation of any and all removal, transportation, and disposal actions, specific plans must be finalized for approval by both the EPA in consultation with the State. Please make the appropriate changes throughout this workplan stating that all plans, reports, and soil verification sample results will be reviewed and approved prior to completion by both the EPA in consultation with DEQ.

7. Page 2-2, paragraph 2, Section 2.1.1 Task 1-Project Planning, Subsection Sampling and Analytical Plan

WR Grace must also collect soil background samples along with background air samples. Please include in the workplan that soil background samples will be collected.

8. Page 2-2, paragraph 4, Section 2.1.1 Task 1-Project Planning, Subsection Health and Safety Plan

To ensure that all DEQ personnel are familiar with the H&S Plan, the HSP prepared by ACandS must be included in this Workplan for review by DEQ.

9. Page 2-3, paragraph 4, Section 2.1.1 Task 1-Project Planning, Subsection Traffic Control Plan

Currently, (and for the entire summer) the bridge on highway 37, which crosses the Kootenai River and is directly adjacent to the only access to the Former Export Plant, is under heavy construction. Consequently, only one lane on the bridge is usable and traffic builds up on both sides of the road for extended periods of

time. Numerous large removal trucks will be leaving and entering the site at various times throughout the day. How will WR Grace deal with this problem?

10. Page 2-3, paragraph 5, Section 2.1.1 Task 1-Project Planning, Subsection Dust Control Plan

Please identify the location of the mine site well.

11. Page 2-3, paragraph 1, Section 2.1.1 Task 1-Project Planning, Subsection Traffic Control Plan

Please identify the other alternative water supplies suggested to be used.

12. Page 2-3, paragraph 1, Section 2.1.1 Task 1-Project Planning, Subsection Traffic Control Plan

DEQ does not agree with the following sentence. "Magnesium chloride liquid will be considered for use as a dust suppressant." Because the road is constructed of former mine tailings, DEQ requests that at a minimum one application of magnesium chloride be used for the entire gravel mine road used by the hauling trucks during the removal actions. In addition, if the first application of magnesium chloride weathers overtime, WR Grace must re-apply an additional coat to control potential dust problems. Please correct this sentence stating the magnesium chloride will be used and re-applied as needed.

13. Page 2-4, paragraph 1, Section 2.1.1 Task 1-Project Planning, Subsection Erosion Control Plan

The workplan does not address how WR Grace will prevent sediment erosion into lower Rainy Creek. Please include in this subsection a detailed discussion of WR Grace's plans to prevent erosion of sediment into lower Rainy Creek.

14. Page 2-4, paragraph 1, Section 2.1.1 Task 1-Project Planning, Erosion Control Plan

The workplan states that "any soil that is staged on site during excavation work will be covered with plastic." Any soil that is staged on site must also be wetted to prevent dust blowing from the pile into the nearby town. In addition, the plastic cover must be securely fastened down to prevent wind from blowing the contaminated soil around. Please change the sentence to state that the staged soil will be wetted and the plastic cover secured.

15. Page 2-4, paragraph 2, Section 2.1.1 Task 1-Project Planning, Subsection Building Decontamination Plan

The workplan does not contain a detailed description of the methods that will be used to clean each building on Site. Without a detailed description of the methods used for cleaning the buildings, the methods used for sample verification, methods used for dust suppression, health and safety issues, etc. DEQ does not believe the workplan adequately addresses the decontamination of the buildings.

DEQ does not agree with WR Grace's plan to clean each building on Site. DEQ believes that these buildings cannot be cleaned to a level that will guarantee the future safety of any users. DEQ believes, that all the buildings on the Site must be demolished and all contaminated material hauled to the mine site for proper disposal. Specifically, DEQ does not believe that asbestos can be fully removed from wood surfaces, between wood siding and framing, between wood beams and metal siding, and in hanging rafters with the method proposed in the workplan.

Please indicate in this subsection that a detailed abatement plan is provided for buildings located on the Site in sections 2.1.7 through 2.1.11

16. Page 2-4, paragraph 2, Section 2.1.1 Task 1-Project Planning, Subsection Building Decontamination Plan

Please provide a schematic of the layout of all personnel decontamination stations. Also, include a description of these stations in the text.

Please indicate how WR Grace will transport all salvageable material to the Sprung structure.

17. Page 2-4, paragraph 3, Section 2.1.1 Task 1-Project Planning, Subsection Building Decontamination Plan

WR Grace indicates that all cleaned items will be "visually inspected and certified clean prior to staging." Asbestos fibers cannot be "visually" seen; therefore, all items cleaned by WR Grace must have surface samples (i.e. wipes or core samples) collected and analyzed prior to staging in the Sprung structure. If the laboratory results indicate any material (wood or equipment) is still contaminated, then the material must be re-washed and re-tested until the material is clean according to laboratory test results.

18. Page 2-4, paragraph 5, Section 2.1.1 Task 1-Project Planning, Subsection Building Decontamination Plan

WR Grace indicates that all cleaned buildings will be "visually inspected" and air samples collected to determine if they are clean. Asbestos fibers cannot be "visually" seen; therefore, all buildings cleaned by WR Grace must have surface samples (i.e. wipes or core samples) collected for each and every beam, support structure, and all surfaces including walls and the floor. All collected samples must be analyzed prior to considering the building clean. In addition, both the EPA and the DEQ must review all sample results. If the laboratory results indicate any surface (support structure, floor, etc) is still contaminated, then the entire building must be re-washed and re-tested until the entire building is clean according to laboratory test results.

WR Grace must provide a detailed sample and analysis plan with the workplan outlining how many samples will be collected in each building, how the samples will be collected, what type of sample will be collected, and what method(s) will be used to analyze the samples.

19. Page 2-5, paragraph 2, Section 2.1.1 Task 1-Project Planning, Subsection Disposal Site Closure and Institutional Control Plan

The closure plan for the mine site must be reviewed and approved by the DEQ. It is not appropriate to incorporate the mine site closure plan in this workplan. WR Grace will need to address the entire mine site, including mine permitted areas, before complete mine site closure can be addressed.

Therefore, please delete this section and incorporate a section which outlines how WR Grace will dispose of the material hauled from the Export Plant at the mine site. Include in this section a map showing the location of the disposal area, reclamation (cover material and vegetation) plans, and any other relevant issues.

20. Page 2-5, paragraph 5, Section 2.1.2 Task 2-Project Management

What will be included in the "Weekly Progress Reports?"

21. Page 2-6, paragraph 1, Section 2.1.3 Task 3-Mobilization

DEQ representatives must be present during the weekly meetings with subcontractors and the EPA.

22. Page 2-6, paragraph 4, Section 2.1.4 Task 4-Site Preparation

WR Grace indicates a storage area will be established for "contaminated materials" prior to transportation for disposal. The area will be lined with 2-mil plastic and surrounded by a berm; however, the contaminated material will not be covered to stop dust or asbestos from entering the air and migrating offsite. DEQ request that all contaminated material stored onsite during site preparation or during removal action be wetted and covered with plastic to prevent a release of contamination.

23. Page 2-6, paragraph 4, Section 2.1.4 Task 4-Site Preparation

WR Grace must post warning signs next to all hazardous material storage areas. Please indicate the substance of these signs and that these signs will be posted.

24. Page 2-7, paragraph 2, Section 2.1.4 Task 4-Site Preparation

Please indicate where the filtered water will be disposed.

25. Page 2-8, paragraph 1, Section 2.1.5 Task 5-Site Support Services, Subsection – Equipment

WR Grace indicates that "local laborers will be hired to support the project." Will these "local laborers" be properly trained and aware of safety precautions?

26. Page 2-8, paragraph 4-6, Section 2.1.5 Task 5-Site Support Services, Subsection – Appraisal

All property belonging to Millworks West must be thoroughly cleaned prior to storing in the Sprung structure. Prior to storage all equipment, wood, and other cleaned products must be sampled (wipe samples). All samples must be analyzed using EPA Method ISO 10321 and results of the confirmation analyses reviewed and approved by EPA and DEQ.

27. Page 2-9, Section 2.1.6 Task 6-Furnish/Install/Operate and Maintain Sprung Structure

Did WR Grace coordinate with the owners of Millworks West to make sure the size of the Sprung Structure is adequate for what Millworks West needs?

Placing the Sprung structure in the north side of the former baseball fields will limit access for the owners of Millworks West. How will WR Grace allow the owners access to the structure for material they will need to run their business?

How will WR Grace keep the access road to the Export Plant, which will also be the access road to the Sprung Structure clean of contaminated material?

The proposed location of the Sprung structure will likely create a loss of business to Millworks West. In addition, the owners of Millworks West have stated that they do not agree with the location of the Sprung structure. WR Grace must find another location that will be suitable for the owners to run their daily store front business, if the present location is determined to be totally unsuitable.

Millworks West has indicated that they must be able to operate their business store front operation in a safe location. WR Grace has indicated that they will supply the Sprung Structure for the location of the owner's materials, but this is an inadequate location for Millworks West to run its daily operations. WR Grace must relocate the owners and their storefront operations to a safe area. WR Grace must coordinate with the owners of MillWorks West, the City of Libby, the EPA and the DEQ on how, when and where this will happen. Please include in the revised workplan a section on business relocation.

28. Page 2-9 through 2-12, Sections 2.1.7 – 2.1.11, Tasks 7-11 Decontamination of Buildings

See comment 16 concerning decontamination of buildings.

See comments 10 and 29 concerning access.

Please include a detailed Health and Safety Plan that addresses each section.

WR Grace must provide a detailed abatement action plan outlining how the buildings will be cleaned.

How will WR Grace prevent Millworks West machinery (engines, parts, wood, etc.) from being destroyed by the power washer? How will WR Grace collect samples from this equipment?

Will WR Grace use the existing utilities or will they create their own power source? If WR Grace is using the existing utilities, how will the power lines be protected from power washing?

WR Grace must supply a detailed sampling and analysis plan (SAP) for verification sampling for each building prior to commencing work. The SAP must be reviewed and approved by DEQ and EPA prior to commencing work. DEQ and EPA must review and approve of all verification samples results.

How will WR Grace allow the owners access to the Planer Shop and the Sprung Structure while abatement on other buildings occurs?

How will WR Grace keep contaminated dust from entering the Planer shop while abatement on other buildings is occurring? Will the operations of the planer impact the ambient air sampling occurring around the building?

How will WR Grace keep trespassers from entering the Site at night?

29. Page 2-13, Task 12-Demolished Shed Decontamination

WR Grace does not mention how they will clean the concrete foundation slab or the soil beneath the slab. To prevent the need for deed restriction on the Site, which the City of Libby has indicated they do not want, WR Grace must show that the concrete slab, as well as the soil beneath the slab does not contain elevated levels of asbestos fibers that warrant a concern for removal. Please change the language in the workplan to indicate that the concrete slab will be excavated and disposed of at the mine site.

30. Page 2-13, Task 13-Transportation to and Disposal at Mine Site

See comments 6, 10, and 20 on disposal of contaminated material at the mine site.

In the first sentence of this section, WR Grace states that disposal at the mine site will be approved by "Grace, the site owner, and the state." WR Grace has indicated that they will purchase the mine site from the current owners. If this occurs, then the current owners do not need to approve of the disposal options at the mine site. Furthermore, WR Grace, the State, and the EPA must approve disposal of the contaminated material at the mine site. Please correct the language.

After touring the mine site with WR Grace, the EPA and the State, disposal options for contaminated material have changed. Please correct the language to state that excavated soil will be stockpiled at "Area 19" and that contaminated material will be disposed of at "Level 12." Please include a map showing the location for the stockpiled soil and the contaminated debris.

How will WR Grace mitigate potential dust problems from the mine site disposal areas during options?

Final restoration must include overburden material that is sufficient enough to support vegetation. The workplan must address final restoration of the stockpile area(s) and the contaminated material pile(s) as well as the seeding and possible amendments to the overburden material. Please include in this workplan for review and approval by the DEQ and the EPA a detailed restoration plan for the mine site disposal areas.

31. Page 2-14, Section 2.1.14, Task 14-Surface Excavation

WR Grace indicates that confirmation samples will be collected and analyzed by PLM. Please indicate how these samples will be taken, how many samples will be taken, and where the samples will be taken. Please provide this a section in the Sampling and Analysis Plan (SAP)

WR Grace indicates that they will clean the buildings then excavate the contaminated soil. If WR Grace cleans the buildings first then excavates the contaminated soil around the buildings, how will WR Grace prevent the buildings from becoming contaminated again by the heavy equipment excavation activities occurring around the buildings?

Finally, DEQ and the EPA desire to take independent confirmation samples during any time of the abatement action. Please include a statement indicating that both the DEQ and the EPA will be allowed to collect independent confirmation samples.

32. Page 2-14, Section 2.1.16, Task 15-Backfill and Compaction

Please indicate where WR Grace will obtain all backfill material and quality. How will WR Grace grade and compact the backfill material with a dozer?

33. Page 2-14, Section 2.1.17, Task 16-Demobilization

WR Grace must transport all material temporarily stored in the Sprung structure back to the buildings they were taken from. Please include a statement indicating that WR Grace will place all material stored in the Sprung structure back onto Millworks West buildings.

34. Page 2-16, Section 2.1.7, Task 17-Final Report

In addition to the items already specified in the workplan, the Final report must also include, at a minimum, all the following information:

A) Restoration actions,
B) All sample results (table format),
C) All sample locations (map),
D) All laboratory QA/QC data, and
E) A total quantity of all soil and building material transported for disposal.

35. Page 2-16, Section 2.2 Air Monitoring Requirements

How many battery powered pumps will be used? Personal air monitoring pumps must be used for all workers. Please include a section describing that personal air monitoring pumps will be used. Include the type of pumps used, acceptable PEL's, and analytical methods for samples.

Please provide more details on the air sampling equipment such as pump rates, hours of sampling, calibration and location of stations.

36. Page 2-17, Section 2.2.1, Background Air Samples

Please include the number and location of all air and soil samples collected. PCM analysis is not acceptable according to the EPA SOW; all background and daily air monitoring samples must be analyzed by TEM.

37. Page 2-17, paragraph 2, Section 2.2.2 Ambient Daily Air Monitoring

All sample results obtained by WR Grace must be reported to both the EPA and the DEQ within 24 hours of collection. Please change the language in this section stating that samples will be reported to both DEQ and EPA.

WR Grace must perform aggressive air sampling methods for each building following the completion of abatement.

38. Page 2-17, paragraph 3, Section 2.2.2 Ambient Daily Air Monitoring

The language in this section indicates the EPA will review WR Grace's data submittals, and that the EPA will determine whether total particulate measurements can be substituted for asbestos PCM analysis. According to the EPA's SOW all samples must be analyzed by TEM. Please change the language to indicate that samples will be analyzed by TEM. In addition, EPA , in consultation with DEQ will

determine whether total particulate measurements can be used. Please correct the language in this section to reflect these changes and that the EPA's SOW will be followed.

39. Page 2-18, paragraph 5, Section 2.2.4 Ambient Final Clearance Air Samples

Please change the language in this section to indicate that both the EPA and the DEQ will review WR Grace's data submittals within one week of the removal of all contaminated material from the Site.

40. Page 2-23, paragraph 2, Section 2.4.2 Sampling and Analysis Plan

The SAP must be included in the workplan for review and approval by both the DEQ and the EPA. Please include a detailed SAP in the revised workplan.

41. Page 2-23, paragraph 5, Section 2.4.3 Health and Safety Plan

The Health and Safety Plan (H&S Plan) must be included in the workplan for review by both the DEQ and the EPA. Please include a detailed H&S Plan in the revised workplan.

42. Page 2-24, paragraph 2, Section 2.4.4 Project Execution Plans

Please change the first sentence in the first paragraph of this section to indicate that WR Grace will be required to submit for review and approval all documents to both the EPA and the DEQ.

43. Page 2-25, Section 2.4.9 Documentation of Off-Site Shipment

Any separate facility used for disposal of hazardous substances, pollutants or contaminants must be reviewed and approved by the EPA and the DEQ. In addition, WR Grace must , no later than ten days prior to any off-site shipment of hazardous substances from the site to an out-of-state waste management facility, provide written notification of such shipment of hazardous substances to the appropriate state environmental official in the receiving state and to EPA and DEQ. The notification must be in writing, and shall include the following information: (1) the name and location of the facility to which hazardous substances are to be shipped; (2) the type and quantity of hazardous substances to be shipped; (3) the expected schedule for the shipment of the hazardous substances; and (4) the method and route of transportation. Respondent must notify EPA, DEQ, and the receiving state of major changes in the shipment plan, such as a decision to ship the hazardous substances to another facility within the same state or to a facility in another state.

44. Page 3-1, Section 3.0 Project Organizational Chart

Please incorporate the following state DEQ coordinator into the Project Organization Chart and line of communication.

John Constan
DEQ Project Manager

Please change figure 3.1 to include the above DEQ representative.